

ORIGINAL



BEFORE THE ARIZONA CORPORATION COMMISSION

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Arizona Corporation Commission

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IN THE MATTER OF THE APPLICATION  
OF DIECA COMMUNICATIONS DBA  
COVAD COMMUNICATIONS COMPANY,  
ESCHELON TELECOM OF ARIZONA, INC.,  
MCLEODUSA TELECOMMUNICATIONS  
SERVICES, INC., MOUNTAIN  
TELECOMMUNICATIONS, INC., XO  
COMMUNICATIONS SERVICES, INC. AND  
QWEST CORPORATION REQUEST FOR  
COMMISSION PROCESS TO ADDRESS KEY  
UNE ISSUES ARISING FROM TRIENNIAL  
REVIEW REMAND ORDER, INCLUDING  
APPROVAL OF QWEST WIRE CENTER  
LISTS.

DOCKET NOS. T-03632A-06-0091  
T-03406A-06-0091  
T-03267A-06-0091  
T-03432A-06-0091  
T-04302A-06-0091  
T-01051B-06-0091

QWEST CORPORATION'S  
RESPONSE IN OPPOSITION TO THE  
JOINT CLECS' MOTION TO  
COMPEL

Qwest Corporation ("Qwest") submits this response to Covad Communications  
Company, Eschelon Telecom of Oregon, Inc., Mountain Telecommunications, Inc.,  
McLeodUSA Telecommunications Services, Inc., and XO Communications Services, Inc.'s  
(collectively "Joint CLECs") motion to compel. In support, Qwest states

INTRODUCTION AND SUMMARY

In response to the Joint CLECs' July 5, 2006 set of 45 data requests, Qwest provided the  
Joint CLECs the comprehensive set of data it used to determine which wire centers in Arizona  
satisfied the FCC's *TRRO* wire center "non-impairment" criteria. However, Qwest properly  
objected to one request at issue in this motion to compel (request no. 44).

The data that is relevant to this proceeding is Qwest's April 2004 filing of December

1 2003 data in Qwest's ARMIS 43-08 annual report to the FCC. This December 2003 ARMIS  
2 data is the data that Qwest submitted to the FCC in February 2005 in support of its initial wire  
3 center list and is consistent with the data upon which the FCC relied to make its wire center non-  
4 impairment criteria determinations in its *TRRO* order.

5 Through their data request, the Joint CLECs seek data updated through March 2005 (or,  
6 if March data is not available, through December 31, 2004). The data the Joint CLECs seek is  
7 new, additional data which is different from the data the FCC used to make its fundamental  
8 determinations in its *TRRO*. Changing or modifying the thorough, detailed data that Qwest has  
9 already provided is both unnecessary and contrary to the FCC's stated intent regarding the data  
10 on which non-impairment decisions are to be made.

11 The Joint CLECs' data request and motion to compel are an attempt to impose upon  
12 Qwest an ongoing, open-ended obligation to produce additional data. Compelling Qwest to  
13 produce the data responsive to the request would result in precisely the type of complex and  
14 lengthy proceeding that the FCC intended to avoid. As the FCC stated in the *TRRO*, "[w]e are  
15 acutely aware of the need to base any test we adopt here on the most objective criteria possible in  
16 order to avoid complex and lengthy proceedings that are administratively wasteful but add only  
17 marginal value to our unbundling analysis." *TRRO*, ¶ 99.

18 Accordingly, for the reasons set forth below, the data the Joint CLECs seek is irrelevant,  
19 adds nothing to the probative value of determining the accuracy of the original "non-impaired"  
20 wire center list, and is not reasonably calculated to lead to the discovery of admissible evidence.  
21 Even a broad and liberally-construed policy favoring discovery in most instances does not apply  
22 in situations where the data requests at issue have no relevance to the issues or scope of the  
23 docket. Thus, the Commission should deny the Joint CLECs' motion to compel.

**ARGUMENT**

**I. Qwest's use of December 2003 data is consistent with the data the FCC analyzed in making its non-impairment decisions in the *TRRO* and is the available data when the FCC directed RBOCs to submit their non-impaired list of wire centers**

Qwest's use of December 2003 ARMIS data is consistent with the data the FCC analyzed in making its non-impairment decisions in the *TRRO*. This December 2003 ARMIS data is also the data that was available when the FCC directed Qwest and the other RBOCs to submit the list of wire centers that meet the non-impairment criteria, which Qwest did in February 2005. Specifically, the FCC in its *TRRO* stated: "The BOC wire center data that we analyze in this Order is based on ARMIS 43-08 business lines, plus business UNE-P, plus UNE loops." *TRRO*, ¶ 105. The data which formed the basis for the FCC's analysis was ARMIS data from December 2003, which Qwest filed in April 2004. This same data was also the data that was available on February 4, 2005 when the FCC directed Qwest and the other RBOCs to submit the list of wire centers that meet the FCC's non-impairment criteria. Consequently, the use of December 2003 data is both appropriate and consistent with the FCC's intent to base determinations on "an objective set of data that incumbent LECs already have created for other regulatory purposes." *TRRO*, ¶ 105.

In their motion to compel, the Joint CLECs argue that Qwest's December 2004 ARMIS data was or should have been available at the time that Qwest made its wire center filing with the FCC in February 2005. That assertion is mistaken, however, as ARMIS data is not filed until April of the following calendar year.<sup>1</sup> More importantly, however, even if such data had been available as of February 2005 (or even as of the March 11, 2005 effective date of the *TRRO*), the data would still not be relevant to an inquiry of the wire center list and data that Qwest submitted to the FCC at the FCC's direction in February 2005. Qwest's February 2005 filing at the FCC used *December 2003* data. If the FCC had desired its wire center lists to be based on subsequent

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<sup>1</sup> There was also no FCC filing of ARMIS data as of March 2005. Thus, the Joint CLECs' request for that data (see data request nos. 33 and 34) also cannot be satisfied.

1 data, it most certainly would have requested such data. However, the FCC did not request any  
2 subsequent data. Rather, it requested the wire center lists based on the most current data  
3 available *at the time* those lists were filed in February 2005.<sup>2</sup>

4 The Joint CLECs claim in their motion that the *TRRO* did not specify the date on which  
5 these counts were to be made. They claim, however, that because the order “became effective on  
6 March 11, 2005,” “[t]he determinations made pursuant to that order . . . should be based on data  
7 that is contemporaneous with that date.” (Joint CLECs’ Motion, p. 3.) However, Qwest *did* in  
8 fact provide the data that was readily available, and that the FCC requested, at that point in time.  
9 The FCC had requested that RBOCs compile the list of non-impaired wire centers prior to the  
10 March 11, 2005 effective date, and thus the “most current data available” at that time was the  
11 December 2003 ARMIS data.<sup>3</sup>

12 Accordingly, the Joint CLECs’ attempts to deny that the FCC clearly contemplated the  
13

14 <sup>2</sup> The Joint CLECs’ data requests also beg the question why they did not act promptly in  
15 response to the wire center data that Qwest provided in February 2005 shortly after the FCC  
16 issued the *TRRO*. Even if the December 2004 data were relevant to these issues, which it is not,  
17 it would not be reasonable for the Joint CLECs’ one-year delay in disputing Qwest’s wire center  
18 list to serve as the basis for requiring Qwest to undertake an entirely new, time-consuming data-  
19 gathering effort.

20 <sup>3</sup> The Joint CLECs’ make the nonsensical argument that “the FCC obviously  
21 contemplated that the wire center designations are to be based on the most current data available  
22 because the *TRRO* expressly contemplates future non-impairment designations, which would be  
23 meaningless if only 2003 data could be considered” (Joint CLECs’ Motion, p. 3). Qwest  
24 certainly agrees that the *TRRO* expressly contemplates future non-impairment designations.  
25 Those future designations (i.e., subsequent updates to the list), of course, will be made based on  
26 the “most current data available” *at that time* (the ARMIS data filed and available *at the date of*  
*future filings*). For example, as the Washington Commission correctly ruled, “[o]n a going-  
forward basis, however, Qwest and Verizon must submit the *most recent ARMIS 43-08 data*  
*when seeking to add any new wire centers* to the list of non-impaired wire centers the  
Commission resolves in this proceeding.” *Washington Initial Order*, p. 10, ¶ 24. For example, if  
Qwest were to seek to designate an additional wire center as non-impaired for DS1/DS3 loops or  
transport at any point during the remainder of 2006, Qwest would be required to utilize 2005  
ARMIS data (the most current ARMIS data available today). In other words, if in July 2006,  
Qwest were to seek to add a particular wire center to the non-impaired wire center list based on  
business line counts, it would need to rely on the most current available ARMIS report, which  
was its 2005 ARMIS 43-08 report. That certainly does not mean, however, that the *initial* wire  
center designation, which is what this Commission is considering in this docket, should be  
anything other than the “most current available data” *at the time that Qwest submitted its list to*  
*the FCC* in February 2005.

1 application of “readily available” data completely disregard the plain language of the *TRRO*.  
2 Qwest respectfully submits the Commission should thus deny the Joint CLECs’ motion to  
3 compel.

4 **II. Other state commissions agree with Qwest about the use of December 2003 data**

5 In support of their motion the Joint CLECs quote from a Michigan Commission decision.  
6 However, that decision is not persuasive for the reasons set forth above. Moreover, the Joint  
7 CLECs neglect to note that the Washington Utilities and Transportation Commission rejected the  
8 Joint CLECs’ position, and thus agreed with Qwest that the *December 2003* data was the  
9 appropriate data for the wire center lists. The Washington Commission ruled as follows: “This  
10 order finds *December 2003* data appropriate for evaluating Qwest’s and Verizon’s initial  
11 designation of non-impaired wire centers.” (Emphasis added.)<sup>4</sup>

12 The Washington Commission further elaborated as follows:

13 ***Discussion and decision.*** It is reasonable for Verizon and Qwest to submit to the  
14 Commission *December 2003 ARMIS data* to support the designation of their initial list of  
15 “non-impaired” wire centers. It was the *most recent data* on file with the FCC at the time  
16 it entered the *TRRO*. The FCC used this data in establishing the wire center tiers. Qwest  
and Verizon used this data in filing their initial lists of non-impaired wire centers with the  
FCC. (Emphasis added.)<sup>5</sup>

17 Other commissions have ruled similarly. For example, the Texas Commission affirmed  
18 AT&T Texas’ utilizing December 2003 ARMIS 43-08 access line data in its non-impairment

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20 <sup>4</sup> *In the Matter of the Investigation Concerning the Status of Competition and Impact of*  
21 *the FCC’s Triennial Review Remand Order on the Competitive Telecommunications*  
*Environment in Washington State*, Docket UT-053025, Order 3 (April 20, 2006) (“*Washington*  
*Initial Order*”), p. 2, ¶ 4.

22 <sup>5</sup> *Washington Initial Order*, p. 9, ¶ 23. The Washington Commission also rejected the  
23 Joint CLECs’ argument that Qwest should provide “updated data” so that the Joint CLECs could  
“verify[] the status of other wire centers.” The Commission ruled:

24 It would be inconsistent to determine the initial list of non-impaired wire centers based on  
25 data from different time periods. *Qwest and Verizon’s use of December 2003 data for the*  
*purpose of determining the initial list of wire centers is appropriate.* Therefore, the Joint  
26 CLECs’ request for Qwest and Verizon to provide updated ARMIS 43-08 data is rejected.  
*Washington Initial Order*, p. 10, ¶ 24.

1 analysis. The Texas Commission found in its investigation that “the method used by AT&T  
2 Texas for determining business line counts is consistent with the FCC’s instructions for reporting  
3 business line counts for ILEC wire centers.”<sup>6</sup> Just a few weeks ago, the Ohio Commission  
4 specifically approved the use of 2003 ARMIS data, finding:

5       The Commission finds that, for the initial list of wire centers, the use of the most  
6       recent ARMIS data available at the time of designation, which in this case was the  
7       December 2003 ARMIS business line counts, is appropriate. . . . While the 2004  
8       ARMIS data is now available, using it for the initial wire center impairment  
9       determinations for high capacity loops and transport would be at odds with the  
10       way future wire center impairment determinations will be made (i.e., using the  
11       most recent data available at the time of the designation).<sup>7</sup>

12 The Ohio Commission concluded:

13       Finally, the Commission rejects the CLEC Coalition’s request for access to the  
14       confidential business line information provided to the FCC in December 2004, inasmuch  
15       as this information is not relevant to the implementation of the current FCC rule  
16       pertaining to business lines.<sup>8</sup>

17 Similarly, in their state *TRRO* wire center non-impairment review proceedings, the Illinois and  
18 Indiana commissions each approved SBC’s wire center non-impairment lists -- which were each  
19 based upon of December 2003 access line data.<sup>9</sup> Although the commission orders did not

20 <sup>6</sup> *Post-Interconnection Dispute Resolution Proceeding Regarding Wire Center UNE*  
21 *Declassification*, PUC Docket No. 31303, Order Approving Methodology to Determine AT&T  
22 Texas Wire Centers which are Non-impaired, Texas PUC (issued April 7, 2006), at p. 29.

23 <sup>7</sup> *In the Matter of the Petition of XO Communications, Inc. Requesting a Commission*  
24 *Investigation of Those Wire Centers that AT&T Ohio Asserts are Non-impaired*, Ohio PUC, Case  
25 No. 05-1393-TP-UNC, Finding and Order (June 6, 2006) (“*Ohio TRRO Order*”), at p. 20.

26 <sup>8</sup> *Id.*, at p. 32.

<sup>9</sup> Arbitration Decision, *Petition for Arbitration pursuant to Section 252(b) of the*  
*Telecommunications Act of 1996 with Illinois Bell Telephone Company to Amend Existing*  
*Interconnection Agreements to Incorporate the Triennial Review Order and the Triennial Review*  
*Remand Order*, Ill. Commerce Com’n., ICC Docket No. 05- 0442 (Nov. 2, 2005), at p. 30 (in  
which the Commission found that SBC’s business line count methodology was consistent with  
the FCC methodology and data used by the FCC, without making a determination specifically on  
the vintage of the data); see also Direct Testimony of Carol A. Chapman in *Petition for*  
*Arbitration pursuant to Section 252(b) of the Telecommunications Act of 1996 with Illinois Bell*  
*Telephone Company to Amend Existing Interconnection Agreements to Incorporate the Triennial*  
*Review Order and the Triennial Review Remand Order*, p. 38, lines 889 through 898 (where  
SBC clearly states that 2003 ARMIS data was the data provided to the FCC). Ms. Chapman’s  
direct testimony can be found on the Illinois Commerce Commission e-docket website link:

1 specifically include language explicitly endorsing the use of the December 2003 data, one can  
2 reasonably assume that had these commissions believed a more current data vintage was  
3 required, they would have ordered SBC to provide updated access line counts.

4 Further still, in Verizon states, in which the procedural mechanism for establishing wire  
5 center non-impairment was through tariff filings (as opposed to fully contested dockets), the  
6 original list of non-impaired wire centers was based on December 2003 business line data. For  
7 example, in its filing to expand its original non-impaired wire center list in Rhode Island,  
8 Verizon stated:

9 The original wire center list, which is being updated here, was based principally  
10 on 2003 data, as amended in late 2004 to reflect terminated collocation  
arrangements.<sup>10</sup>

11 Finally, the CLECs note that the Utah Commission recently granted the CLECs' motion  
12 to compel in that proceeding. (Joint CLEC Motion, p. 4.) However, although the Commission  
13 in Utah granted the CLEC motion, it expressly ruled that it was "not decid[ing] at this point  
14 whether Qwest should be required to use 2003 or 2004 data" (unlike the Washington  
15 Commission, which did make clear that December 2003 data was the appropriate data). The  
16 Utah Commission may still yet agree with the Washington Commission on the appropriate data  
17 vintage now that the hearing in that state has been completed and after the post-hearing briefs  
18 have been filed. Accordingly, the Utah ruling should not be persuasive here.

19 Accordingly, the vast majority of state commissions that have addressed this issue have  
20 agreed that the December 2003 data submitted to the FCC is the appropriate data in these types  
21 of cases.<sup>11</sup>

22 <http://eweb.icc.state.il.us/e%2Ddocket/> [browse docket function with docket 05-0442, SBC  
23 Testimony filed 9/6/05 at 11:22 a.m.]; *In the Matter of the Indiana Utility Regulatory*  
24 *Commission's Investigation of Issues Related to the Implementation of the Federal*  
*Communication Commission's Triennial Review Remand Order and the Remaining Portions of*  
25 *the Triennial Review Order*, Cause No. 42857, Issue 3, Ind. Utility Reg'y. Com'n (approved  
January 11, 2006), at pp. 15-16.

26 <sup>10</sup> Docket No. 3662, Verizon Rhode Island Proposed Revision to PUC Tariff 18, RI PUC  
(Jan. 13, 2006), fn. 4.

1 **III. The Joint CLECs' other arguments are not well taken**

2 Finally, the Joint CLECs allege that “[w]hen describing the wire center data to be used to  
3 calculate business lines for determining non-impairment, the FCC expressly referenced its *FCC*  
4 *Report 43-08 – Report Definition* dated December 2004,” which the Joint CLECs aver means  
5 that the FCC “obviously contemplated that 2004 (or later) ARMIS data compiled consistent with  
6 this report would be used.” (Joint CLEC Motion, pp. 4-5.) However, the Joint CLECs strain  
7 much too hard to make this argument. The fact of the matter is that the Joint CLECs  
8 misrepresent the meaning of the FCC’s footnote. Footnote 303 refers to the *FCC Report 43-08*  
9 *Report Definitions* that were to be used in the preparation of December 2004 ARMIS data.<sup>12</sup>  
10 These definitions do not contain actual 2004 ARMIS *data* as the CLECs imply, but simply  
11 provide *instructions* for the preparation of year-end 2004 data that would be available in April  
12 2005. Obviously, 2004 ARMIS *data* was not available in December 2004, and therefore “the  
13 BOC wire center data that we [the FCC] analyze in this order” could not possibly be based on  
14 2004 ARMIS data—as the Joint CLECs imply.

15 The Joint CLECs further claim that updating the data to at least December 2004 might in  
16 some way narrow the issues in this docket. (Joint CLECs’ Motion, p. 5.) This argument is not  
17 persuasive. To the contrary, updating the data would actually add an additional level of  
18 complexity to the matter. This is especially so because if December 2004 ARMIS data were to  
19 be used, the process for adding wire centers to the list would need to be determined *before* the  
20

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21 <sup>11</sup> The Joint CLECs also argue that another RBOC (BellSouth) used 2004 ARMIS data  
22 for its business line count information to initially designate wire centers as non-impaired, and  
23 they cite to a decision in North Carolina. However, the fact that one RBOC out of four may have  
24 voluntarily agreed in North Carolina to use December 2004 data (presumably with concurrence  
25 or without objection from the CLECs in that state) is completely irrelevant and not probative of  
26 the issue regarding the most current and readily available data that the FCC requested, and that  
Qwest and other RBOCs provided. Clearly, the most current and readily available data that the  
FCC requested, and that Qwest and other RBOCs provided, was the December 2003 data from  
their April 2004 ARMIS filings.

<sup>12</sup> The full document is available at  
<http://www.fcc.gov/wcb/armis/documents/2004PDFs/4308c04.pdf>, as shown in fn. 303.




1 initial list could be finalized. Qwest believes that the Commission should validate the original  
2 wire center list before it begins to update that validated list.

3 **CONCLUSION**

4 Accordingly, Qwest respectfully submits that the Joint CLECs' motion to compel is not  
5 well taken. The data request at issue (of 48 total requests) to which Qwest has objected is neither  
6 relevant to the issues in this proceeding nor reasonably calculated to lead to the discovery of  
7 admissible evidence. Qwest is, of course, mindful that the discovery rules in Arizona and this  
8 Commission's discovery processes are broadly and liberally construed. Qwest is also aware that  
9 the Commission generally encourages disclosure of information through the discovery process  
10 and usually defers a determination as to relevancy at the hearing after material has been  
11 disclosed. However, some requests, like the request at issue here, are simply too far afield and  
12 remote to the issues of the case, and/or that would serve to expand, complicate or confuse the  
13 proceeding so significantly, that Qwest must object to them. Despite a policy of broad  
14 discovery, the Commission should not allow discovery that goes beyond the issues of the case  
15 simply for the sake of discovery. As such, Qwest submits that the Commission should deny the  
16 Joint CLECs' motion to compel in its entirety.

17 RESPECTFULLY SUBMITTED, this 7th day of August, 2006.

18 QWEST CORPORATION

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3	Granite Telecommunications, LLC 234 Copeland Street Quincy, MA 02169	Lightyear Network Solutions, LLC 1901 Eastpoint Parkway Louisville, KY 40223
5	Matrix Telecom, Inc. 2912 Lakeside Drive Oklahoma, OK 73120	Max-Tel Communications, Inc. P.O. Box 280 Alvord, TX 76225-0280
7	MCI Worldcom Network Services 201 Spear Street, 9 <sup>th</sup> Floor San Francisco, CA 94105	MCImetro Access Transmission Services, LLC dba MCImetro 201 Spear Street, 9 <sup>th</sup> Floor San Francisco, CA 94105
10	McLeodUSA Telecommunications Services, Inc. 6400 "C" Street P.O. Box 3177 Cedar Rapids, IA 52406	Mohave Cooperative Services, Inc. P.O. Box 20037 Bullhead City, AZ 86539
13	Mountain Telecommunications, Inc. 1430 W. Broadway, Suite 206 Tempe, AZ 85282	Mpower Communications Corp. 171 Sully's Trail, Suite 202 Pittsford, NY 14534
15	National Brands, Inc. dba Sharenet Communications 4633 W. Polk Street Phoenix, AZ 85043	New Access Communications, LLC 801 Nicollet Mall, Suite 350 Minneapolis, MN 55402
18	New Edge Network, Inc. dba New Edge Networks 3000 Columbia House Boulevard, Suite 106 Vancouver, WA 98661	North County Communications Corporation 3802 Rosencrans, Suite 485 San Diego, CA 92110
21	NOS Communications, Inc. dba International Plus 4380 Boulder Highway Las Vegas, NV 89121	Now Communications, Inc. 1695 High Street, Suite B Jackson, MS 36205
24	NTC Network LLC 633 West 5 <sup>th</sup> Street, 56 <sup>th</sup> Floor Los Angeles, CA 90071	NTERA, Inc. 1020 N.W. 163 <sup>rd</sup> Drive Miami, FL 33169
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1	One Point Communications – Colorado, LLC dba Verizon Avenue	OnFiber Carrier Services, Inc. 11921 N. Mopac Expressway, Suite 100
2	Two Conway Park 150 Field Drive, Suite 300	Austin, TX 78759
3	Lake Forest, IL 60045	
4	Orbitcom, Inc. 1701 N. Louise Avenue	Pac-West Telecom, Inc. 1776 W. March Lane, Suite 250
5	Sioux Falls, SD 57107	Stockton, CA 95207
6	Payroll Advance, Inc. dba The Phone Connection	Preferred Carrier Services Dba Phones For All/Teléfonos Para Todos
7	808 S. Baker Street Mountain Home, AR 72653	14681 Midway Road, Suite 105 Addison, TX 75001
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9	Premiere Network Services, Inc. 1510 N. Hampton Road, Suite 120	QuantumShift Communications, Inc. 126 Alcosta Boulevard, Suite 418
10	DeSoto, TX 75115	San Ramon, CA 94583
11	Qwest Communications Corporation 1801 California Street, Room 1240	Regal Diversified, Inc. dba Regal Telephone Company
12	Denver, CO 80202	1119 W. Kent, Suite J Missoula, MT 59801
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14	Rhythms Links, Inc. 7337 South Revere Parkway	Rural Network Services, Inc. 2205 Keithley Creek Road
15	Englewood, CO 80112	P.O. Box 217 Midvale, ID 83645
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17	Rural West-Western Rural Broadband, Inc. 20717 N. 83 <sup>rd</sup> Place	SanTrac Technologies, Inc. P.O. Box 535
18	Scottsdale, AZ 85255	Glendale, AZ 85311
19	SBC Long Distance, Inc. 5850 W. Las Positas Boulevard	ServiSense.com, Inc. 180 Wells Avenue, Suite 450
20	Pleasanton, CA 94588	Newton, MA 02459-3302
21	Southwest Metro Communications, Inc. 1850 McCulloch Boulevard, Suite C1-B	Southwestern Telephone Company, Inc. P.O. Box 5158
22	Lake Havasu City, AZ 86403	Madison, WI 53705
23	Sprint Communications Company, L.P. 6391 Sprint Parkway, MS:Z2400	Sprint Spectrum LP dba Sprint PCS
24	Overland Park, KS 66251	4900 Main Street, 12 <sup>th</sup> Floor Kansas City, MO 64112
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1	Syniverse Networks, inc. dba TSI Telecommunication Network Services	Talk America, Inc. 6805 Route 202
2	One Tampa Center, Suite 700	New Hope, PA 18938
3	Tampa, FL 33602	
4	TCG Phoenix	Tel West Communications, LLC
5	6554 S. Zeno Court	P.O. Box 94447
6	Aurora, CO 80016	Seattle, WA 87124
7	TelLogic	Telscape Communications, Inc.
8	dba Quality Telephone	606 E. Huntington Drive
9	370 N. Market Street	Monrovia, CA 91016
10	Dallas, TX 75202	
11	Telseon Carrier Services, Inc.	The J. Richard Company
12	7887 E. Belleview, Suite 600	dba Live Wire Phone Company
13	Englewood, CA 80111	4607 E. Molly Lane
14		Cave Creek, AZ 85331
15	Time Warner Telecom of Arizona, LLC	Trans national Communications
16	10475 Park Meadows Drive, Suite 400	International, Inc.
17	Littleton, CO 80124	2 Charlesgate West
18		Boston, MA 02215
19	TransAmerican Telephone, Inc.	Tri-M Communications, Inc.
20	209 E. University	Dbas TMC Communications
21	Denton, TX 76201	820 State Street, 5 <sup>th</sup> Floor
22		Santa Barbara, CA 93101
23	Trinsic Communications, Inc.	UCN, Inc.
24	601 S. Harbour Island Boulevard	14870 S. Pony Express Drive
25	Suite 220	Bluffdale, UT 84065
26	Tampa, FL 33602	
27	United States Telecommunications, Inc.	Valley Connections, LLC
28	5251 – 110 <sup>th</sup> Avenue North	P.O. Box 970
29	Clearwater, FL 33760	Wilcox, AZ 85644
30	Vanion Telecom, Inc.	Vartec Telecom, Inc.
31	2 North Cascade, Suite 900	dba Vartec Telecom (R) / Clear Choice
32	Colorado Springs, CO 80903	Communications
33		2440 Marsh Lane
34		Carrollton, TX 75006



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| 1  | Verizon Select Services, Inc.<br>6665 N. MacArthur Boulevard<br>2 HQK02D84<br>3 Irving, TX 75039         | VIVO-AZ<br>300 E. Maple Road-270, Suite 210<br>Birmingham, MI 48009   |
| 4  | Western CLEC Corporation<br>3650 – 131 <sup>st</sup> Avenue SE<br>5 Bellevue, WA 98006                   | Wilshire Connection, LLC<br>633 West Street, 56 <sup>th</sup> Floor<br>Los Angeles, CA 90071                      |
| 6  | WilTel Communications, LLC<br>One Technology Center<br>7 Mail Drop: TC13B<br>8 Tulsa, OK 74103           | WilTel Local network, LLC<br>dba WLNI, LLC<br>One Technology Center<br>Mail Drop: TC-7B<br>Tulsa, OK 74103        |
| 9  | XO Communications Services, Inc.<br>1730 Rhode Island Avenue NW, Suite 1000<br>10 Washington, DC 20036   | XO Communications, Inc.<br>1730 Rhode Island Avenue NW, Suite 1000<br>Washington, DC 20036                        |
| 11 | Xspedius Management Co of Pima County,<br>LLC<br>12 14405 Laurel Place, Suite 200<br>13 Laurel, MD 20707 | Xspedius Management Co. Switched Services,<br>LLC<br>7125 Columbia Gateway Drive, Suite 200<br>Columbia, MD 21046 |
| 14 | Zephion Networks Communications, inc.<br>2950 Gallows Road<br>15 Falls Church, VA 22042                  | Gregory T. Diamond<br>Senior Counsel<br>Covad Communications Company<br>7901 Lowry Blvd.<br>Denver, CO 80320      |
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